

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JUDY KNOOPP, derivatively on behalf of
SLACK TECHNOLOGIES, INC.,

Plaintiff,

vs.

STEWART BUTTERFIELD, ALLEN SHIM,
BRANDON ZELL, ANDREW BRACCIA,
EDITH COOPER, SARAH FRIAR, JOHN
O'FARRELL, CHAMATH PALIHAPITIYA,
and GRAHAM SMITH,

Defendants,

and

SLACK TECHNOLOGIES, INC.,

Nominal Defendant.

C.A. No. 20-cv-566-LPS

DEMAND FOR JURY TRIAL

CARL ROBIN KIRCHMANN, derivatively
on behalf of SLACK TECHNOLOGIES,
INC.,

Plaintiff,

vs.

STEWART BUTTERFIELD, ALLEN SHIM,
BRANDON ZELL, ANDREW BRACCIA,
EDITH COOPER, SARAH FRIAR, JOHN
O'FARRELL, CHAMATH PALIHAPITIYA,
and GRAHAM SMITH,

Defendants,

and

SLACK TECHNOLOGIES, INC.,

Nominal Defendant.

C.A. No. 20-cv-567-LPS

DEMAND FOR JURY TRIAL

KRISTEN GORENBERG, derivatively on behalf of SLACK TECHNOLOGIES, INC.,

Plaintiff,

v.

STEWART BUTTERFIELD, ANDREW BRACCIA, EDITH COOPER, SARAH FRIAR, JOHN O'FARRELL, CHAMATH PALIHAPITIYA, and GRAHAM SMITH,

Defendants,

and

SLACK TECHNOLOGIES, INC.,

Nominal Defendant.

C.A. No. 20-cv-625-LPS

DEMAND FOR JURY TRIAL

**STIPULATION AND [PROPOSED] ORDER
REGARDING THE APPOINTMENT OF CO-LEAD COUNSEL**

WHEREAS, on May 15, 2020, Plaintiffs Judy Knopp and Carl Robin Kirchmann, plaintiffs in the above-captioned actions bearing C.A. No. 20-566-LPS and C.A. No. 20-567-LPS, respectively, filed a Motion for Consolidation and Appointment of Co-Lead Counsel and Local Counsel in each of their respective actions, as well as the above-captioned action bearing C.A. No. 20-625-LPS, seeking to consolidate the above-captioned actions and to appoint The Rosen Law Firm, P.A. and The Brown Law Firm, P.C. as Co-Lead Counsel and Farnan LLP as Local Counsel (the “Motion”);

WHEREAS, on May 29, 2020, Plaintiff Kristen Gorenberg filed a Cross-Motion for Consolidation and Appointment of Lead and Liaison Counsel, seeking for the Court to appoint her as Lead Plaintiff, Moore Kuehn, PLLC, as Lead Counsel, and O’Kelly & Ernst, LLC, as Liaison Counsel (the “Cross-Motion”);

WHEREAS, on June 12, 2020, Plaintiffs Judy Knopp and Robin Kirchmann filed a brief in opposition to the Cross-Motion;

WHEREAS, as stated in the Motion, the Defendants are in favor of consolidation of the above-captioned actions, but do not take a position on the appointment of counsel or a leadership structure; and

WHEREAS, Plaintiffs Judy Knopp, Robin Kirchmann, and Kristen Gorenberg (“Plaintiffs”) agree that it would be in the interest of judicial economy and efficiency and in the best interest of Nominal Defendant Slack Technologies, Inc. (“Slack”) for the Court to appoint The Rosen Law Firm, P.A. and The Brown Law Firm, P.C. as Co-Lead Counsel and Farnan LLP as Local Counsel for plaintiffs in the consolidated action.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by Plaintiffs, subject to the approval of the Court, that:

1. Plaintiff Kristen Gorenberg hereby withdraws the Cross-Motion.
2. The following actions are related and consolidated for all purposes, including pre-trial and trial, under Civil Action No. 20-cv-00566-LPS (collectively the “Consolidated Action”):

<u>Case Name</u>	<u>Case Number</u>	<u>Dated Filed</u>
<i>Knopp v. Butterfield, et al.</i>	20-cv-566-LPS	April 27, 2020
<i>Kirchmann v. Butterfield, et al.</i>	20-cv-567-LPS	April 27, 2020
<i>Gorenberg v. Butterfield, et al.</i>	20-cv-625-LPS	May 8, 2020

3. The Consolidated Action shall bear the following caption:

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

IN RE SLACK TECHNOLOGIES, INC.
SHAREHOLDER DERIVATIVE
LITIGATION,

C.A. No.: 20-cv-566-LPS
(Consolidated)

4. All papers filed in connection with the Consolidated Action need only be filed in Civil Action No. 20-cv-566-LPS.

5. This Order shall apply to each derivative action brought on behalf of Slack that is subsequently filed in, removed to, or transferred to, the United States District Court for the District of Delaware that relates to the same or substantially similar subject matter as the Consolidated Action. Any such subsequently-filed derivative action shall be automatically consolidated into the Consolidated Action.

6. The law firms The Rosen Law Firm, P.A. and The Brown Law Firm, P.C. are appointed Co-Lead Counsel for plaintiffs in the Consolidated Action.

7. Co-Lead Counsel shall have sole authority to:

- a. determine and present (in briefs, oral argument, or such other fashion as may be appropriate, personally or by a designee), to the Court and opposing parties, the position of the plaintiffs in the Consolidated Action on all matters arising during pretrial proceedings;
- b. coordinate the initiation and conduct of discovery on behalf of plaintiffs in the Consolidated Action, consistent with the requirements of the Federal Rules of Civil Procedure and Local Rules;
- c. conduct settlement negotiations on behalf of plaintiffs in the Consolidated Action;
- d. delegate specific tasks to other counsel in such a manner as to ensure that pre-

trial preparation for plaintiffs in the Consolidated Action is conducted efficiently and effectively;

- e. enter into stipulations and/or agreements with opposing counsel as necessary for the conduct of the litigation;
- f. monitor the activities of all counsel to ensure that schedules are met and unnecessary expenditures of time and funds are avoided; and
- g. perform such other duties as may be incidental to the proper coordination of plaintiffs' pre-trial activities in the Consolidated Action or authorized by further order of the Court.

8. The law firm Farnan LLP is appointed Local Counsel for plaintiffs in the Consolidate Action.

9. Local Counsel shall be available and responsible for communications to and from this Court, including distributing orders and other directions from the Court to counsel. Local Counsel shall be responsible for creating and maintaining a master service list of all parties and their respective counsel.

10. The law firm Moore Kuehn, PLLC is designated as Additional Counsel for plaintiffs in the consolidated action.

IT IS SO STIPULATED.

Dated: June 24, 2020

FARNAN LLP

/s/ Brian E. Farnan
Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 N. Market St., 12th Floor
Wilmington, DE 19801
Telephone: (302) 777-0300
Facsimile: (302) 777-0301
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

*[Proposed] Local Counsel for Plaintiffs and
Local Counsel for Plaintiffs Judy Knopp and
Carl Robin Kirchmann*

THE BROWN LAW FIRM, P.C.

Timothy Brown
240 Townsend Square
Oyster Bay, NY 11771
Telephone: (516) 922-5427
Facsimile: (516) 344-6204
Email: tbrown@thebrownlawfirm.net

*[Proposed] Co-Lead Counsel for
Plaintiffs and Counsel for Plaintiff
Judy Knopp*

THE ROSEN LAW FIRM, P.A.

Phillip Kim
275 Madison Avenue, 34th Floor
New York, NY 10016
Telephone: (212) 686-1060
Facsimile: (212) 202-3827
Email: pkim@rosenlegal.com

*[Proposed] Co-Lead Counsel for
Plaintiffs and Counsel for Plaintiff
Carl Robin Kirchmann*

O'KELLY & ERNST, LLC

/s/ Ryan M. Ernst
Ryan M. Ernst (No. 4788)
824 N. Market Street, Suite 1001A
Wilmington, DE 19801
Tel: (302) 778-4000
Dir./Fax: (302) 778-4002
rernst@oelegal.com

Local Counsel for Plaintiff Gorenberg

MOORE KUEHN, PLLC

Justin A. Kuehn
Fletcher W. Moore
30 Wall Street, 8FL
New York, NY 10005
Tel:(212) 709-8245
jkuehn@moorekuehn.com
fmoore@moorekuehn.com

*[Proposed] Additional Counsel for Plaintiffs
and Counsel for Plaintiff Gorenberg*

SO ORDERED this ____ day of June, 2020.

Honorable Leonard P. Stark
Chief United States District Court Judge